

I'm writing to express my concern over the interference potential of Broadband over Power Line (BPL) being considered under notice of inquiry 03-104. As a licensed amateur and commercial radio operator owning amateur radio station K1CT, I see considerable vulnerability of my FCC licensed operations to the interference that can be expected from the deployment of BPL in my neighborhood. I urge the FCC to adopt stringent rules, controls, and enforcement to eliminate the interference potential of BPL.

The noise associated with BPL will very significantly impact my ability to communicate in support of the Amateur Radio Emergency Service, Red Cross, and other public service activities in which I am actively engaged. This BPL generated noise can be expected to complicate an already congested RF environment which is already under siege from unintended/unlicensed radiation from a wide variety of consumer computing and electronic devices. In addition to the expected impact of BPL on licensed amateur radio operations, I anticipate significant interference to other radio spectrum users such as over the air television reception (particularly to TV channels 2 through 5), shortwave broadcast listening, Citizens Radio Service, the public service communications low VHF band, and radio controlled models. In some cases noted BPL will be a major impact on legitimate users use of existing licensed services, in others the public's safety is threatened through the potential degradation of communications reliability.

A further concern in regards to BPL is its susceptibility to RF emissions from existing licensed radio stations. Because of the inherent low shielding efficiency provided by widely spaced powerline transmission lines, BPL will be especially vulnerable to licensed radio transmitter operations particularly in urban and suburban environments. Nearby consumers are not going to tolerate interruptions to their paid BPL internet access by licensed radio operations in their area. They will apply pressure directly to the owners of those stations infringing on their FCC licensed operations priviledges. It is not in the public's interest for such a situation to develop.

Several alternatives exist for internet access such as cable, fiber-optic, dial-up, DSL, UHF/Microwave, satellite, and cellphone. There is little need for the additional competition and connectivity provided by BPL. There is not compelling need to place the public good at risk by adopting this risky technology. I note that at least one other country has prohibited the deployment of BPL in response to concerns related to interference.

I urge the FCC to execute its public responsibility to protect FCC licensed users/broadcasters and to act in the public's interest by controlling or restricting the deployment of BPL.

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